

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF WASHINGTON  
UNITED STATES COURTHOUSE  
700 STEWART STREET  
SEATTLE, WASHINGTON 98101

**ROBERT S. LASNIK**  
DISTRICT JUDGE

(206) 370-8810

January 6, 2022

Elizabeth Ann Hanley  
Lindsay Halm  
Ashley Gomez  
Schroeter Goldmark & Bender  
401 Union St. Ste. 3400  
Seattle, WA 98101

Diana S. Shukis  
Andrea L. Bradford  
Foster Garvey PC  
1111 3rd Avenue, Ste. 3000  
Seattle, WA 98101

**Delivered Via CM/ECF**

RE: Eickelmann v. Public Hospital District No 1 of King County,  
No. C21-927-RSL  
Stipulated Protective Order

Dear Counsel:

On January 4, 2022, the Court received your “Stipulated Protective Order.” (Dkt. # 14).

Pursuant to Fed. R. Civ. P. 26(c), protective orders may be entered to protect confidential commercial information and/or to limit the scope of specific disclosures. Such protective orders may issue upon a showing of good cause.

Although parties may agree on confidentiality among themselves, when they request that the Court be involved, the proposed order must be narrowly drawn, identifying both the type of information that is to be protected and, if not obvious, the reason such protection is warranted. The order must also comply with the applicable federal and local procedural rules.

The stipulated protective order submitted in this case is deficient in the following respect:

The description of “confidential” material as including “proprietary business and/or competitive strategy information of VMC” is too broad. Any protective order entered by the Court must be narrowly drawn and clearly identify the class or type of documents subject to the order.

The stipulated protective order received by the Court will remain lodged in the file but will not be entered. The parties may resubmit a proposed order if they remedy the deficiency identified in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mr S Lasnik".

Robert S. Lasnik  
United States District Judge